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To Brent Gilhousen

Date 4/28/94

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Brent 5/4

Excellence in Performance—Pride in Achievement

TECHNICAL STATUS REPORT

CH2M HILL

PREPARED FOR: Tom Post/EPA Region 10

DATE: April 8, 1994

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TECHNICAL STATUS REPORT

PREPARED FOR: Tom Post/EPA Region 10

PREPARED BY: Patt O'Flaherty/CH2M HILL

COPIES: Byung Maeng/Ecology NWRO

DATE: April 7, 1994

SUBJECT: Rhône-Poulenc Monthly Status Report

SITE NAME AND LOCATION: Rhône-Poulenc, Inc./Seattle Plant
Tukwila, WA

REPORTING PERIOD: March 1 through March 31, 1994

PROJECT: SEA35051.A1

Following is CH2M HILL's technical status report summary for the RCRA Corrective Action Project at Rhône-Poulenc's (RPI) Seattle Plant. This status report summarizes activities implemented and planned for this Corrective Action project and is intended to be transmitted to U.S. EPA Region 10 in fulfillment of the monthly progress reports required in Consent Order No. 1091-11-20-3008(h).

Progress Made This Reporting Period

Task A2-Applicable Permits

On March 1, 1994, U.S. EPA (Post), RPI (Liu), CH2M HILL (O'Flaherty), and Hays Consulting (Hays) met in Olympia, WA at Ecology's Headquarters with Howard Steeley, Bob Warren, Byung Maeng, and Leon Wilhelm to discuss NPDES permit requirements for any possible Corrective Action groundwater remediation. Howard Steeley will be Ecology's RCRA Corrective Action contact.

On March 7, 1994 CH2M HILL (O'Flaherty) and Hays Consulting (Hays) met with Cynthia Wellner from Metro to inquire if the Metro Discharge Authorization can be extended beyond June 1995. Ms. Wellner indicated that this is possible for RFI-derived

water, but not for stormwater. At this time, CH2M HILL and Hays Consulting are reviewing what NPDES stormwater requirements apply to the Marginal Way facility.

On March 1, 1994, RPI submitted a letter to Ecology commenting on the proposed 1994 NPDES Wastewater Discharge fee for RCRA Corrective Action sites. During the March 1 meeting with Ecology, Howard Steeley reported the proposed fee was being reduced.

Task A3—Interim Measures

On March 17, 1994, CH2M HILL was verbally notified by ENSCO that the waste profile application submitted earlier in March has been approved for incineration at their El Dorado, Arkansas facility. Written confirmation will follow.

As reported in last month's technical status report, a Clean Environment FRH250-SOS-TID oil skimmer was delivered to the site in late February for use in MW-12. Ancillary equipment (air compressor and tank fittings) for the system were acquired in early March. In early March, it was noted that the LNAPL in MW-12 had dissipated. Subsequent monitoring of MW-12 through the end of the month confirmed the absence of LNAPL at this location. LNAPL monitoring in nearby wells indicated that approximately 1 foot of LNAPL was present in well H-10, a 2-inch-diameter monitoring well. A 2-inch skimmer was subsequently ordered from Clean Environment. Recovery of LNAPL began in well H-10 on March 23. By the end of March, less than one gallon of LNAPL had been recovered from H-10. The poor recovery rate appears to be caused by the well's low yield relative to the LNAPL, not the ability of the recovery pump to remove the LNAPL from the well.

Task A5—RFI Field Investigation

The Hydropunch and soil sampling work continued through March. Sediment sampling was completed.

On March 21, CH2M HILL sent a memorandum to EPA and Ecology indicating that the Hydropunch grid was being expanded based on the strategy described in the work plan. By March 25, the Hydropunch investigation was nearly complete, with approximately 25 borings drilled. Also by March 25, most of the soil sampling across the facility was nearly complete.

Analytical results for all Round 1 groundwater samples have been submitted by the laboratory. The groundwater samples results were grouped into 3 sample delivery groups (SDGs). One of the SDG includes all Appendix IX groundwater samples and is undergoing full data validation. Three soil SDGs were also submitted by the laboratory in March. One of these soil SDGs is undergoing full data validation. Review of the remaining groundwater and soil SDGs is in progress. Additional soil sample analytical result submittals are expected from the laboratory during the week of March 28.

To date, seeps have not been observed by CH2M HILL field staff emanating from the Duwamish River bank at the facility. It is hoped that heavier spring rainfall and associated runoff will create 'sampleable' seeps.

Deliverables Submitted

The February Progress Report was submitted to U.S. EPA on March 10, 1994.

A letter to Ecology commenting on the proposed NPDES permit fees by RPI on March 1, 1994.

A memo to U.S. EPA and Ecology regarding the hydropunch investigation on March 21, 1994.

Outstanding Issues

None to report.

Activities Planned During Next Reporting Period

Task A2-Applicable Permits

No activity planned.

Task A3-Interim Measures

LNAPL recovery from well H-10 will continue. LNAPL monitoring will be conducted periodically in MW-12 and other nearby wells. Recovery will be initiated if product reappears in MW-12.

Task A5-RFI Field Investigation

The remaining soil and Hydropunch groundwater samples will be collected in early April. As of March 25, the following soil sampling work remained:

- 1 9-ft soil boring in the Background Area
- 11 9-ft soil borings in Area A2
- Approximately 10 "6-inch" soil samples

Also as of March 25, three deep borings remain to be drilled. These borings will be drilled in for hydrogeologic characterization, collection of soil samples for physical testing, and collection of "deep" hydropunch groundwater samples.

It is anticipated that 1) surveying of the soil and Hydropunch borings and 2) slug tests will be conducted in April. CH2M HILL will continue to survey the river bank for evidence of seeps. Seep sampling will be conducted, conditions permitting. Data evaluation and validation will continue.

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